

CONVERSATION RECORD

TIME

DATE

11/25/83

TYPE

☐ VISIT

☒ CONFERENCE

☐ TELEPHONE

☐ INCOMING

☐ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, dept., bureau, etc.)

TELEPHONE NO.

SUBJECT

SUMMARY

ROUTING

NAME/SYMBOL

INT

Jane Sullena

MDNR

Transfer of ERRIS files for 3012 Grant

Attached is the file for the above facility which appears on ERRIS:

Facility Name: GMC Truck/Coach

ID Number: MD000687509

ACTION REQUIRED

Transferred to MDNR 3012 Program

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

ACTION TAKEN

SIGNATURE

TITLE

DATE

314-772-6108
Filed Ute ^{Map} Div
GMC Truck/Coach Truck Dealership -
ST Louis Wash DC
2310 Chouteau Ave
Chouteau Ave
SL 63103

Mr Charles Hanley -
"Hanby" correct
MOD000687509

change
address
in computer

Thinks probably they should
not be in system

they received financial
letters

ROUTING AND TRANSMITTAL SLIP

Date

9/17

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1.

Alfetta

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

GMC - MO 000687509
Change to S & H ✓
only
Cancel # ✓

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
clearances, and similar actions.

FROM: (Name, org. symbol, Agency/Post)

hh

Room No.—Bldg.

Phone No.

137
Mr. Charles Hamby
GMC Truck & Coach Division
2210 Chouteau Avenue
St. Louis, Missouri 63103

RE: MOD000687509

Dear Mr. Hamby:

Our records show that in 1980, you submitted a Resource Conservation and Recovery Act (RCRA) notification for the above listed facility, and indicated that it was involved in the "treatment, storage and disposal" (TSD) of a hazardous waste as defined in 40 CFR Parts 260-265. However, you did not elect to complete your request for Interim Status under the Act by following that notification with the submittal of a Part A Permit Application. It is no longer possible to receive Interim Status except under selected conditions, according to the RCRA regulations, but as a "TSD" facility, you may be subject to the full RCRA permitting regulations unless you advise us to the contrary.

Many persons completed this notification form incorrectly, so for purposes of clarification, you should consider the following in determining your correct status under the regulations:

1. If you treat on site, store on site longer than 90 days, or dispose on site any of the hazardous wastes listed in 40 CFR Part 261, your facility is probably correctly identified as a TSD.
2. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 1000 kg per month (2200 lbs) or 1 kg per month (2.2 lbs) of an acute hazardous waste as listed, and if you do not store these wastes for longer than 90 days, then your facility is probably correctly identified as a generator.
3. If your facility is engaged in the transportation of any of these hazardous wastes in the course of your operating processes, then it is probably correctly identified as a transporter. If the material is transported from your facility by another firm, then your facility is not a transporter.

4. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 100 kg per month but less than 1000 kg/month your facility is a generator by definition under the Missouri State Hazardous Waste Law and Regulations, but is defined as a "small quantity generator" under the Federal RCRA regulations.

5. If you notified us under RCRA because your hazardous waste was identified as "PCB's," you are regulated under the Toxic Substances Control Act (TSCA), and may be exempt from regulation under RCRA.

6. You should have checked block "D", Underground Injection, if an injection well is located at your facility. An injection well is defined as any man-made hole in the ground that is deeper than it is wide and that is used for the subsurface placement of fluid, including septic tanks that have the capacity to serve 20 or more people.

In order to correctly identify your facility's status within the program, it is very important that you consider the above points and respond to us in writing within 15 days of the date of receipt of this letter, providing us with the correct information. The letter should be signed by the person who signed the initial notification, or if that person is no longer employed by the facility, it should be signed by his or her successor and your letter should so state. If we do not hear from you within 15 days, it will be necessary to refer your file to our Compliance staff for additional follow-up.

If you have any questions about this process, please contact Ms. Betti Harris, Missouri Coordinator, who can be reached at 816-374-6534.

Thank you for your cooperation.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: David Bedan, Director
Waste Management Program, MDNR

Enclosure

B2

Mo D000687509

Mr. Floyd H. Uthe
Service Manager
GMC Truck & Coach Division
2210 Chouteau Avenue
St. Louis, Missouri 63103

Dear Mr. Uthe:

Thank you for your prompt response to our request for clarification of your status in the Federal Resource Conservation and Recovery Act (RCRA) program.

Based on our telephone conversation and your written response we are changing your status to small quantity generator with reduced requirements. Your identification number is being cancelled.

If your process should change, or if you should have any questions, please feel free to contact Mrs. Betty Harris of my staff. She can be reached at 816-374-6534.

The action described in this letter pertains only to the Federal RCRA system and does not dismiss you from compliance with the Missouri Solid and Hazardous Waste Laws and Regulations 260.200 - 260.240 RSMo and 260.350 - 260.430 RSMo respectively. If you have any questions concerning the State regulations, please contact the Waste Management Program of the Missouri Department of Natural Resources at 314-751-3241.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: David Bedan, Director
Waste Management Program, MDNR

bcc: Mike Sanderson, AWCN

ARWM:WMBR:SPRS:B.HARRIS:Jp:x6534:9/13/82

SPRS SPRS WMBR
HARRIS MCLAUGHIN MORBY

[Handwritten signatures and initials]
9/14
9/16/82

181
CERTIFIED MAIL
Return Receipt Requested

June 17, 1982

Mr. Charles Hanley
GMC Truck and Coach Division
2210 Choteau Avenue
St. Louis, Missouri 63103

EPA I.D. NO. MOD000687509 ✓

Dear Mr. Hanley:

You previously submitted a Resource Conservation and Recovery Act (RCRA) Part A permit application, which indicates you own or operate a hazardous waste management facility which is currently operating under interim status in the State of Missouri. I am writing you to make you aware of two recent amendments to the RCRA regulations. On April 7, 1982, the Environmental Protection Agency (EPA) published interim final rules in the Federal Register requiring owners and operators of hazardous waste management facilities to demonstrate financial responsibility for the costs of closure and post-closure care. EPA published third party liability coverage requirements for owners or operators of hazardous waste management facilities in the April 16, 1982, Federal Register.

Closure and Post Closure Assurance

As an owner or operator of a hazardous waste treatment, storage, or disposal (TSD) facility, you are required to submit information that demonstrates that you are financially capable of bearing the costs of closing your facility. In addition, if you own or operate a disposal facility, you also must submit information that demonstrates that you are capable of covering the costs of post-closure care of your facility.

The appropriate documentation, as specified in the enclosed regulations, must be submitted to this EPA Regional Office by July 6, 1982. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- o a trust agreement;
- o a surety bond;
- o a letter of credit, including a standby trust agreement;
- o a certificate of insurance;

- o a letter from your firm's chief financial officer, an auditor's report, and a report of examination from an independent certified public accountant; or
- o a corporate guarantee.

Liability Coverage

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you must demonstrate that you have liability coverage for sudden accidental occurrences at your facility. You may use either an insurance policy or a financial test to demonstrate third party liability coverage. You must submit to this office by July 15, 1982, the appropriate documentation for liability coverage for sudden accidents, as specified in the enclosed regulations.

In addition, if you own or operate a landfill, surface impoundment, or land treatment facility, you must also demonstrate that you have liability insurance for nonsudden accidental occurrences at your facility. You must submit the appropriate documentation for liability coverage for nonsudden accidents, as specified in the enclosed regulations, according to the following phase-in schedule: if you have annual sales or revenues of \$10 million or more, by January 16, 1983; if you have sales or revenues between \$5 and \$10 million, by January 16, 1984; or if your annual sales or revenues are less than \$5 million, by January 16, 1985. If you fall into one of the last two groups, you must submit notification of when you will have liability coverage for nonsudden accidents by January 16, 1983. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- o a certificate of insurance;
- o a liability endorsement; or
- o a letter from your firm's chief financial officer, an auditor's report, and a report of examination from an independent certified public accountant.

State and Federal facilities are exempt from these requirements, as are those facilities which store hazardous waste for less than 90 days.

As a matter of policy, each state will be implementing its own financial requirements, and we would suggest that your facility contact Joe Jansen, Missouri Department of Natural Resources (MDNR) for the particular state financial requirements.

If your operation status has changed since your Part A was initially submitted and you believe that your facility is not a "TSD" facility to be regulated under the RCRA regulations, and should be exempted from the existing interim status standards, please contact our office.

I suggest that you review the enclosed copies of the revised interim final regulations. Failure to comply with these requirements subjects you to possible enforcement action. If you have any questions, please contact Midge Given, Permits Section at (816) 374-6531 for assistance.

Sincerely yours,

David A. Wagoner
Director, Air and Waste Management Division

Enclosures

P 203.843.123

RECEIPT FOR THE ...

O' space

Charles Hinkley
4 Mrs. Trevelyan Dr.
2210 Chetane Ave.
St. Louis, Mo.

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ized agent

POSTMARK

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

CERTIFIED MAIL